

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS

MICHAEL CARGILL, *et al.*

Plaintiffs,

v.

BUREAU OF ALCOHOL, TOBACCO,
FIREARMS AND EXPLOSIVES, *et al.*

Defendants.

Case No. 1:22-cv-01063-DAE

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE COMBINED MOTION
FOR SUMMARY JUDGMENT AND OPPOSITION**

Defendants respectfully request a fourteen-day extension of time to file their combined motion for summary judgment and opposition to Plaintiffs' motion for summary judgment. Defendants have conferred with Plaintiffs, and Plaintiffs consent to this request.

Per the Court's previous scheduling order, ECF No. 46, Defendants' brief is due on April 29, 2024. Counsel for Defendants have had several conflicting obligations arise in other cases, including a preliminary injunction motion, an expert deposition, and a class certification hearing. Accordingly, Defendants request a fourteen-day extension of time to file their combined brief on May 13, 2024. Additionally, Defendants request that the remaining briefing deadlines also be extended fourteen days, such that Plaintiffs' combined opposition and reply be due June 24, 2024, and Defendants' reply be due July 15, 2024.

WHEREFORE, Defendants respectfully request that the Court enter an order extending the time for the parties' remaining briefing deadlines to be extended fourteen days.

Date: April 19, 2024

Respectfully submitted,

BRIAN M. BOYNTON

Principal Deputy Assistant Attorney General

BRIGHAM J. BOWEN
Assistant Branch Director

/s/ Taylor Pitz

Taylor Pitz (CA Bar No. 332080)

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Counsel for Defendants

CERTIFICATE OF SERVICE

On April 19, 2024, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court for the Western District of Texas by using the CM/ECF system, which will serve a copy upon on counsel of record.

/s/ Taylor Pitz
TAYLOR PITZ
Trial Attorney
U.S. Department of Justice